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**ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY CLASS I PERMIT**

COMPANY: Georgia-Pacific Tissue, LLC
FACILITY: Georgia-Pacific Tissue Mill- Flagstaff
PERMIT #: 1000443
DATE ISSUED: DRAFT PERMIT- PUBLIC NOTICE
EXPIRY DATE:

ABSTRACT

This Title V permit is issued to Georgia-Pacific Tissue, LLC, the Permittee, for operation of their secondary paper mill in 1600 E. Butler Avenue, Flagstaff, Arizona.

At the facility, recycled office waste paper, food carton box trimmings, food carton box stock, and other grades of waste paper are used as raw materials. The raw materials are vigorously blended in pulpers. The pulp is screened and cleaned to remove waxes, dirt and sand and then deinked and bleached with sodium hypochlorite and sodium hydrosulfite to remove printing inks prior to the manufacture of finished recycled product. Deinked pulp is sent to either of the two paper machines located at the facility. The dewatering process occurs by applying a vacuum prior to mechanically pressing water out of the paper sheet. Final drying occurs in a set of cylindrical dryers supplied with steam from a Cleaver Brooks boiler or through high velocity hot air cap hoods.

The facility has potential VOC emissions in excess of 100 tpy and is therefore classified as a "major source" for VOC. The facility is accepting voluntary limitations on hypochlorite usage to limit chloroform emissions below the major source threshold of 10 tpy. This permit is issued in accordance with Title 49, Chapter 3 of the Arizona Revised Statutes. All definitions, terms, and conditions used in this permit conform to those in the Arizona Administrative Code R18-2-101 et. seq. (A.A.C.) except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the A.A.C. All terms and conditions in this permit are enforceable by the Administrator of the U.S. Environmental Protection Agency.

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ATTACHMENT "A": GENERAL PROVISIONS

**Air Quality Control Permit No. 1000443
for
Georgia-Pacific Tissue, LLC**

I. PERMIT EXPIRATION AND RENEWAL

[A.R.S. § 49-426.F, A.A.C. R18-2-304.C.2, 306.A.1, and 322]

- A. This permit is valid for a period of five years from the date of issuance of the permit.
- B. The Permittee shall submit an application for renewal of this permit at least 6 months, but not more than 18 months prior to the date of permit expiration.

II. COMPLIANCE WITH PERMIT CONDITIONS

[A.A.C. R18-2-306.A.8.a. and b, A.R.S. § 49-463, and A.R.S. §49-464]

- A. The Permittee shall comply with all the conditions contained in Attachments “A” and “B” of this permit including all applicable requirements of the Arizona air quality statutes and the air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act (Act).
- B. Need to halt or reduce activity is not a defense. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR
TERMINATION FOR CAUSE**

[A.A.C. R18-2-306.A.8.c and 321.A]

- A. The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- B. The permit shall be reopened and revised under any of the following circumstances:

1. Additional applicable requirements under the Act become applicable to the Class I source. Such reopening shall only occur if there are three or more years remaining in the permit term. The reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to R18-2-322(B). Any permit revision required pursuant to this subparagraph shall comply with provisions in R18-2-322 for permit renewal and shall reset the five year permit term.
 2. Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Class I permit.
 3. The Director or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 4. The Director or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.
- C. Proceedings to reopen and issue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall, except for reopenings under paragraph 1 above, affect only those parts of the permit for which cause to reopen exists. Such reopenings shall be made as expeditiously as practicable. Permit reopenings for reasons other than those stated in paragraph III.B.1 of this Attachment shall not result in a resetting of the five year permit term.

IV. POSTING OF PERMIT

[A.A.C. R18-2-315]

Permittee shall post this permit, or a certificate of permit issuance where the facility is located in such a manner as to be clearly visible and accessible. All equipment covered by the permit shall be clearly marked with one of the following:

- A. Current permit number.
- B. Serial number or other equipment number that is also listed in the permit to identify that piece of equipment.

- C. A copy of the complete permit shall be kept on the site.

V. FEE PAYMENT

[A.A.C. R18-2-326 and 306.A.9.]

Permittee shall pay fees to the Director pursuant to A.R.S. § 49-426(E) and A.A.C. R18-2-326.

VI. ANNUAL EMISSIONS INVENTORY QUESTIONNAIRE

[A.A.C. R18-2-327]

- A. Permittee shall complete and submit to the Director an annual emissions inventory questionnaire. The questionnaire is due by March 31 or ninety days after the Director makes the inventory form available each year, whichever occurs later, and shall include emission information for the previous calendar year.
- B. The questionnaire shall be on a form provided by the Director and shall include the information required by A.A.C. R18-2-327.

VII. COMPLIANCE CERTIFICATION

- A. Permittee shall submit a compliance certification to the Director twice each year, which describes the compliance status of the source with respect to each permit condition. The first certification shall be submitted no later than April 15th, and shall report the compliance status of the source during the period between September 16th of the previous year, and March 15th of the current year. The second certification shall be submitted no later than October 15th, and shall report the compliance status of the source during the period between March 16th and September 15th of the current year.

[A.A.C. R18-2-309.2.a]

The compliance certifications shall include the following:

1. Identification of each term or condition of the permit that is the basis of the certification;
[A.A.C. R18-2-309.2.c.i]
2. Compliance status with each applicable requirement;
[A.A.C. R18-2-309.2.c.ii]
3. Whether compliance was based on continuous or intermittent data;
[A.A.C. R18-2-309.2.c.iii]
4. Identify each deviation and take it into account in the compliance certification;

[40 CFR §70.6.c.5.iii.C]

5. Any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; [40 CFR §70.6.c.5.iii.B]
 6. Method(s) used for determining the compliance status of the source, currently and over the reporting period; [A.A.C. R18-2-309.2.c.iv]
 7. A progress report on all outstanding compliance schedules submitted pursuant to Section XII.D of this Attachment. Progress reports submitted with compliance certifications satisfy the reporting requirements of A.A.C. R18-2-309.5.d. [A.A.C. R18-2-309.5.d]
- B. A copy of all compliance certifications for Class I permits shall also be submitted to the EPA Administrator. [A.A.C. R18-2-309.2.d]

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

[A.A.C. R18-2-309.3]

Any document required to be submitted by this permit, including reports, shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this part shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

IX. INSPECTION AND ENTRY

[A.A.C. R18-2-309.4]

The Permittee shall allow the Director or the authorized representative of the Director upon presentation of proper credentials to:

- A. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;
- B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
- C. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

- D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
- E. Record any inspection by use of written, electronic, magnetic and photographic media.

X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD

If this source becomes subject to a standard promulgated by the Administrator pursuant to section 112(d) of the Act, then the Permittee shall, within twelve months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard. [A.A.C. R18-2-304.C]

XI. ACCIDENTAL RELEASE PROGRAM

If this source becomes subject to the provisions of 40 CFR Part 68, then the Permittee shall comply with these provisions according to the timeline specified in 40 CFR Part 68.

[40 CFR 68]

XII. REPORTING OF EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCIES

A. EXCESS EMISSIONS REPORTING

[A.A.C R18-2-310.C]

- 1. Excess emissions, as defined in A.A.C. R18-2-101.37, shall be reported as follows:
 - a. The Permittee shall report to the Director any emissions in excess of the limits established by this permit. Such report shall be in two parts as specified below:
 - i. Notification by telephone or facsimile within 24 hours of the time when the Permittee first learned of the occurrence of excess emissions including all available information from paragraph b. of this subsection.
 - ii. Detailed written notification within 72 hours of the notification pursuant to subparagraph (i) of this paragraph.
 - b. Report shall contain the following information:

- i. Identity of each stack or other emission point where the excess emissions occurred.
 - ii. Magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions.
 - iii. Date, time and duration or expected duration of the excess emissions.
 - iv. Identity of the equipment from which the excess emissions emanated.
 - v. Nature and cause of such emissions.
 - vi. If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions.
 - vii. Steps taken to limit the excess emissions.
2. In the case of continuous or recurring excess emissions, the notification requirements of this section shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in such notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period or changes in the nature of the emissions as originally reported shall require additional notification pursuant to subsection A.1.a.(ii) of this Section.
3. It shall be the burden of the Permittee to demonstrate, through submission of the data and information required by Section XII.A of Attachment "A", that all reasonable and practicable measures within the Permittee's control were implemented to prevent the occurrence of excess emissions.

[A.A.C. R18-2-310.D]

[A.A.C. R18-2-310.B]

B. PERMIT DEVIATIONS REPORTING

[A.A.C. R18-2-306.A.5]

1. Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the

probable cause of such deviations, and any corrective actions or preventive measures taken. Prompt reporting shall mean that the report was submitted to the Director by certified mail, facsimile, or hand delivery within two working days of the time the deviation occurred.

2. All instances of deviations from permit requirements shall be clearly identified in the required semiannual monitoring report specified in Attachment "B", Section I, and shall be certified by the responsible official.

[A.A.C. R18-2-306.A.5.a]

C. EMERGENCY PROVISION

[A.A.C. R18-2-306.E]

1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
 - a. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of paragraph (c) of this subsection are met.
 - b. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - i. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - ii. The permitted facility was at the time being properly operated;
 - iii. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - iv. The permittee submitted notice of the emergency to the

Director by certified mail, facsimile, or hand delivery within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

- c. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - d. This provision is in addition to any emergency or upset provision contained in any applicable requirement.
- D. For any excess emission or permit deviation that cannot be corrected within 72 hours, the Permittee is required to submit a compliance schedule to the Director within 21 days of such occurrence. The compliance schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with the permit terms or conditions that have been violated.

[A.R.S. 49-426.I.5]

XIII. RECORD KEEPING REQUIREMENTS

[A.A.C. R18-2-306.A.4]

- A. Permittee shall keep records of all required monitoring information including, but not limited to, the following:
- 1. The date, place as defined in the permit, and time of sampling or measurements;
 - 2. The date(s) analyses were performed;
 - 3. The name of the company or entity that performed the analyses;
 - 4. A description of the analytical techniques or methods used;
 - 5. The results of such analyses; and
 - 6. The operating conditions as existing at the time of sampling or measurement.
- B. Permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings or other data recordings for continuous

monitoring instrumentation, and copies of all reports required by the permit.

XIV. REPORTING REQUIREMENTS

[A.A.C. R18-2-306.A.5.a]

Permittee shall submit the following reports :

- A. Compliance certifications in accordance with Section VII of Attachment “A”.
- B. Reports of excess emissions, permit deviations, and emergencies in accordance with Section XII of Attachment “A”.
- C. Other reports required by Section I of Attachment “B”.

XV. DUTY TO PROVIDE INFORMATION

[A.A.C. R18-2-304.G and 306.A.8.e]

- A. The Permittee shall furnish to the Director, within a reasonable time, any information that the Director may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish an additional copy of such records directly to the Administrator along with a claim of confidentiality.
- B. If the Permittee has failed to submit any relevant facts or if the Permittee has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

XVI. PERMIT AMENDMENT OR REVISION

[A.A.C. R18-2-318, 319 and 320]

Permittee shall apply for a permit amendment or revision for changes to the facility which do not qualify for a facility change without revision under Section XVII, as follows:

- A. Administrative Permit Amendment (A.A.C. R18-2-318);
- B. Minor Permit Revision (A.A.C. R18-2-319);
- C. Significant Permit Revision (A.A.C. R18-2-320).

The applicability and requirements for such action are defined in the above referenced regulations.

XVII. FACILITY CHANGE WITHOUT PERMIT REVISION

[A.A.C. R18-2-317]

- A. Permittee may make changes at the permitted source without a permit revision if all of the following apply:
1. The changes are not modifications under any provision of Title I of the Act or under A.R.S. § 49-401.01(17).
 2. The changes do not exceed the emissions allowable under the permit whether expressed therein as a rate of emissions or in terms of total emissions.
 3. The changes do not violate any applicable requirements or trigger any additional applicable requirements.
 4. The changes satisfy all requirements for a minor permit revision under R18-2-319(A).
 5. The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
- B. The substitution of an item of process or pollution control equipment for an identical or substantially similar item of process or pollution control equipment shall qualify as a change that does not require a permit revision, if it meets all of the requirements of subsections (A) and (C) of this Section.
- C. For each such change under subsections A and B of this Section, a written notice by certified mail or hand delivery shall be received by the Director and, for Class I permits, the Administrator, a minimum of 7 working days in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided less than 7 working days in advance of the change but must be provided as far in advance of the change as possible or, if advance notification is not practicable, as soon after the change as possible. Each notification shall include:
1. When the proposed change will occur.
 2. A description of each such change.
 3. Any change in emissions of regulated air pollutants.

4. The pollutants emitted subject to the emissions trade, if any.
5. The provisions in the implementation plan that provide for the emissions trade with which the source will comply and any other information as may be required by the provisions in the implementation plan authorizing the trade.
6. If the emissions trading provisions of the implementation plan are invoked, then the permit requirements with which the source will comply.
7. Any permit term or condition that is no longer applicable as a result of the change.

XVIII. PERFORMANCE TESTING REQUIREMENTS

[A.A.C.R18-2-312]

A. Operational Conditions During Performance Testing

Performance tests shall be conducted during operation at the full load of the unit under representative operational conditions unless other conditions are required by the applicable test method or in this permit. With prior written approval from the Director, testing may be performed at a lower rate. Operations during start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative operational conditions unless otherwise specified in the applicable standard.

B. Performance tests shall be conducted and data reduced in accordance with the test method and procedures contained in the Arizona Testing Manual unless modified by the Director pursuant to A.A.C. R18-2-312.B.**C. Performance Test Plan**

At least 14 calendar days prior to performing a test, the owner or operator shall submit a test plan to the Director, in accordance with the Arizona Testing Manual. This test plan must include among others identified in the Arizona Testing Manual the following:

1. test duration;
2. test location(s);
3. test method(s); and
4. source operation and other parameters that may affect test results.

D. Stack Sampling Facilities

Permittee shall provide or cause to be provided, performance testing facilities as follows:

1. Sampling ports adequate for test methods applicable to the facility;
2. Safe sampling platforms;
3. Safe access to sampling platforms; and
4. Utilities for sampling and testing equipment.

E. Interpretation of Final Results

Each performance test shall consist of three separate runs using the required test method. Each run shall be conducted in accordance with the applicable standard and test method. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. If a sample is accidentally lost or conditions occur which are not under the Permittee's control and which may invalidate the run, compliance may, upon the Director's approval, be determined using the arithmetic mean of the other two runs. If the Director, or Director's designee, is present, tests may only be stopped with the Director's or such designee's approval. If the Director or the Director's designee is not present, tests may only be stopped for good cause. Good cause includes, forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions or other conditions beyond the Permittee's control. Termination of any test without good cause after the first run is commenced shall constitute a failure of the test. Supporting documentation which demonstrates good cause must be submitted.

F. Report of Final Test Results

A written report of the results of all performance tests shall be submitted to the Director within 30 days after the test is performed. The report shall be submitted in accordance with the Arizona Testing Manual and A.A.C. R18-2-312.A.

XIX. PROPERTY RIGHTS

[A.A.C. R18-2-306.A.8.d]

This permit does not convey any property rights of any sort, or any exclusive privilege.

XX. SEVERABILITY CLAUSE

[A.A.C. R18-2-306.A.7]

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions

remain valid and in force.

XXI. PERMIT SHIELD

[A.A.C. R18-2-325]

Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements identified in Attachment “B” of this permit. The permit shield shall not apply to any changes made pursuant to Section XVI.B of this Attachment and Section XVII of this Attachment.

ATTACHMENT "B": SPECIFIC CONDITIONS**Air Quality Control Permit No. 1000443
for
Georgia-Pacific Tissue, LLC****I. Facility Wide Requirements**

At the time the compliance certifications required by Section VII of Attachment "A" are submitted, the Permittee shall submit reports of all monitoring activities required by this Attachment performed in the same six month period as applies to the compliance certification period. [A.A.C. R18-2-306.A.5.a]

II. Process Sources (Fiber Preparation Operations, Paper Mill, Water Treatment Process, and Storage Tanks)**A. Particulate Matter and Opacity****1. Emission Limitation/ Standard**

- a. In any one hour period, the Permittee shall not cause, allow or permit the discharge of particulate matter into the atmosphere in excess of the amounts calculated by one of the following equations:

- i. For process sources having a process weight rate of 60,000 pounds per hour (30 tons per hour) or less, the maximum allowable emissions shall be determined by the following equation:

$$E = 4.1P^{0.67}$$

where:

E = the maximum allowable particulate emissions rate in pounds-mass per hour.

P = the process weight rate in tons-mass per hour

- ii. For process sources having a process weight rate greater than 60,000 pounds per hour (30 tons per hour), the maximum

allowable emissions shall be determined by the following equation:

$$E = 55P^{0.11} - 40$$

where “E” and “P” are defined as indicated in Paragraph i of this subsection.

[A.A.C. R18-2-730.A.1]

- b. When applying the process weight rate equation, the Permittee shall utilize the total process weight from all similar units employing a similar type process to determine the maximum allowable emissions of particulate matter. [A.A.C. R18-2-730.B]
- c. Permittee shall not cause, allow or permit to be emitted into the atmosphere, any plume or effluent which exceeds 40% opacity as measured by EPA Reference Method 9. [A.A.C. R18-2-702.B]

2. Permit Shield

Compliance with the conditions of this part shall be deemed compliance with A.A.C. R18-2-730.A.1, A.A.C. R18-2-730.B, and A.A.C. R18-2-702.B.

[A.A.C. R18-2-325]

B. Sulfur Dioxide

1. Emission Limitation/Standard

Permittee shall not cause, allow, or permit the discharge of sulfur dioxide into the atmosphere in excess of 600 parts per million. [A.A.C. R18-2-730.A.2]

2. Permit Shield

Compliance with the conditions of this part shall be deemed compliance with A.A.C. R18-2-730.A.2. [A.A.C. R18-2-325]

C. Volatile Organic Compounds

1. Voluntarily Accepted Limitation

Permittee shall limit the usage of hypochlorite in the facility at 584,000

gallons on a rolling twelve month basis.

[A.A.C. R18-2-306.01]

2. Emission Limitations/Standards

a. Permittee shall not cause the emission of gaseous or odorous materials from equipment and operations in such quantities or concentrations as to cause air pollution. [A.A.C. R18-2-730.D]

b. Materials including solvents or other volatile compounds, acids, and alkalis utilized in the process shall be processed, stored, used, and transported in such a manner and by such means that they will not evaporate, leak, escape or otherwise be discharged into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage, or discharge, the installation and use of such control methods, devices, or equipment shall be mandatory.

[A.A.C. R18-2-730.F]

c. Where a stack, vent or other outlet is at such a level that fumes, gas, mist, odor, smoke, vapor, or any combination thereof constituting air pollution is discharged to adjoining property, the Director may require the installation of abatement equipment or the alteration of such stack, vent or other outlet by the Permittee thereof to a degree that will adequately dilute, reduce or eliminate the discharge of air pollution to the adjoining property.

[A.A.C. R18-2-730.G]

3. Monitoring, Recordkeeping, and Reporting

a. Permittee shall maintain a record of the control measures used to limit emissions from the processes. [A.A.C. R18-2-306.A.3.b]

b. Solvent Usage Monitoring

i. Permittee shall record the daily usage of solvents in different processes on week days and pro-rate weekend usage into a daily equivalent usage of solvents.

ii. At the end of every month, Permittee shall record total usage of solvents for that month from the various processes. Also, Permittee shall calculate and record the VOC emissions from those solvents used during that month.

- iii. At the end of every month, Permittee shall update rolling twelve month totals of solvent usage and VOC emissions.
- iv. At the time when the semi-annual compliance certifications are due, Permittee shall submit reports of rolling twelve month totals of solvent usage and associated VOC emissions.
[A.A.C. R18-2-306.A.3.b]

c. Hypochlorite Usage Monitoring

- i. Permittee shall record the daily usage of hypochlorite on week days and pro-rate weekend usage into a daily equivalent usage of hypochlorite.
- ii. At the end of every month, Permittee shall record total usage of hypochlorite for that month. Also, Permittee shall calculate and record the facility-wide chloroform emissions during that month.
- iii. At the end of every month, Permittee shall update rolling twelve month totals of hypochlorite usage and facility-wide chloroform emissions.
- iv. At the time when the semi-annual compliance certifications are due, Permittee shall submit reports of rolling twelve month totals of hypochlorite usage and facility-wide chloroform emissions.

[A.A.C. R18-2-306.A.3.b]

4. Permit Shield

Compliance with the conditions of this part shall be deemed compliance with A.A.C. R18-2-730.D, A.A.C. R18-2-730.F, and A.A.C R18-2-730.G.

[A.A.C. R18-2-325]

III. Cleaver Brooks Boiler

A. Voluntarily Accepted Limitation

Permittee shall burn only natural gas or propane in the Cleaver Brooks boiler.

[A.A.C. R18-2-306.01 & R18-2-306.A.2]

B. Recordkeeping

Permittee shall keep records of the amount of fuel burned each day. As an alternative, this requirement may be complied with by maintaining copies of monthly natural gas or propane purchase bills or fuel meter readings. [40 CFR 60.48c(g)]

C. Permit Shield

Compliance with the conditions of this part shall be deemed compliance with 40 CFR 60.48c(g) [A.A.C. R18-2-325]

IV Paper machine #5 air cap burner, Paper machine #6 air cap burners 1 and 2

A. Voluntarily Accepted Limitation

Permittee shall burn only natural gas and propane in the air cap burners in paper machine #5 and 6. [A.A.C. R18-2-306.01 & R18-2-306.A.2]

B. Opacity Standards

1. Emission Limitations/Standards

Permittee shall not cause, allow or permit to be emitted into the atmosphere, any plume or effluent which exceeds 40% opacity as measured by EPA Reference Method 9. [A.A.C. R18-2-702.B]

2. Permit Shield

Compliance with the conditions of this part shall be deemed compliance with A.A.C.R18-2-702.B. [A.A.C. R18-2-325]

C. Particulate Matter

1. Emission Limitations/Standards

- a. In any one hour period, the Permittee shall not cause, allow or permit the discharge of particulate matter into the atmosphere in excess of the amounts calculated by one of the following equations:

- i. For process sources having a process weight rate of 60,000 pounds per hour (30 tons per hour) or less, the maximum allowable emissions shall be determined by the following equation:

$$E = 4.1P^{0.67}$$

where:

E = the maximum allowable particulate emissions rate in pounds-mass per hour.

P = the process weight rate in tons-mass per hour

- ii. For process sources having a process weight rate greater than 60,000 pounds per hour (30 tons per hour), the maximum allowable emissions shall be determined by the following equation:

$$E = 55P^{0.11} - 40$$

where “E” and “P” are defined as indicated in Paragraph i of this subsection.

[A.A.C. R18-2-730.A.1]

- b. When applying the process weight rate equation, the Permittee shall utilize the total process weight from all similar units employing a similar type process to determine the maximum allowable emissions of particulate matter.

[A.A.C. R18-2-730.B]

2. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-730.A.1 and A.A.C. R18-2-730.B.

[A.A.C. R18-2-325]

V. Non-Point Sources

Opacity and Particulate Matter Standards

A. Emission Limitations/Standards

1. Permittee shall not cause, allow or permit visible emissions from any non-point source to have an opacity in excess of 40% as measured by EPA

Reference Method 9.

[A.A.C. R18-2-610]

2. Permittee shall not cause, allow or permit material loading, material unloading or excavating that results in significant amounts of airborne dust without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne. [A.A.C. R18-2-606]
3. Permittee shall not cause, suffer, allow or permit the use, repair, construction, reconstruction of a roadway or alley without taking reasonable precautions to prevent particulate matter from becoming airborne. [A.A.C. R18-2-605.A]
4. Permittee shall not cause, suffer, allow or permit transportation of materials likely to give rise to airborne dust without taking reasonable precautions to prevent particulate matter from becoming airborne. [A.A.C. R18-2-605.B]
5. Permittee shall employ one or more of the following reasonable precautions or any other method as proposed by the Permittee and approved by the Director to prevent excessive amounts of particulate matter from becoming airborne:
 - a. Use approved dust suppressants, adhesive soil stabilizer, paving, covering, detouring, or wetting agents on, or bar access to open areas during construction operations, repair operations, demolition activities, clearing operations, and leveling operations, or when any earth is moved or excavated; [A.A.C.R18-2-604.A]
 - b. Use approved dust suppressants, adhesive soil stabilizer, or paving on, or bar access to driveways, parking areas, and vacant lots where motor vehicular activity occurs; [A.A.C.R18-2-604.B]
 - c. Use approved dust suppressants, temporary paving, detouring or wetting agents when a roadway is repaired, constructed, or reconstructed; [A.A.C.R18-2-605.A]
 - d. Use dust suppressants, wetting agents, or cover the load adequately when transporting material likely to give rise to airborne dust; [A.A.C.R18-2-605.B]
 - e. Use spray bars, hoods, wetting agents, dust suppressants, or cover when crushing, screening, handling, transporting, or conveying material that is likely to give rise to airborne dust; [A.A.C.R18-2-606]

- f. Adequately cover, or use wetting agents, chemical stabilization, or dust suppressants when stacking, piling, or otherwise storing organic or inorganic dust producing material; [A.A.C.R18-2-607.A]
- g. Operate stacking and reclaiming machinery utilized at storage piles at all times with a minimum fall of material and in such manner, or with the use of spray bars and wetting agents, as to prevent excessive amounts of particulate matter from becoming airborne. [A.A.C.R18-2-607.B]
- h. Use wetting agents or dust suppressants before the cleaning of site, roadway, or alley. Earth or other material shall be removed from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water or by other means. [A.A.C.R18-2-804.B]

B. Monitoring, Reporting, and Recordkeeping

Permittee shall maintain records of the dates on which any of the activities listed in Condition V.A.5.a through h above were performed and control measures employed. [A.A.C R18-2-306A.5.b]

C. Permit Shield

Compliance with the conditions of this part shall be deemed compliance with A.A.C. R18-2-605, A.A.C.R18-2-606, and R18-2-610. [A.A.C. R18-2-325]

VI. Mobile Sources

The requirements of this section are applicable to mobile sources which either move while emitting air contaminants or are frequently moved during the course of their utilization but are not classified as motor vehicles, agricultural vehicles, or are agricultural equipment used in normal farm operations. Mobile sources shall not include portable sources as defined in A.A.C. R18-2-101.84. [A.A.C. R18-2-801]

Opacity Standards

A. Emission Limitations/Standards

Permittee shall not cause, allow, or permit to be emitted into the atmosphere from

any roadway and site cleaning machinery smoke or dust for any period greater than ten consecutive seconds, the opacity of which exceeds 40% opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes. [A.A.C. R18-2-804.A]

B. Permit Shield

Compliance with the conditions of this part shall be deemed compliance with A.A.C. R18-2-801 and A.A.C. R18-2-804.A. [A.A.C. R18-2-325]

VII. Other Periodic Activities

A. Use of Paints

1. Opacity of Visible Emissions

a. Emission Limitations/Standards

Visible emissions from spray painting operations shall not have an opacity greater than 40%, measured in accordance with EPA Reference Method 9. [A.A.C. R18-2-702.B]

b. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C.R18-2-702.B. [A.A.C. R18-2-325]

2. Volatile Organic Compounds

a. Emission Limitations/Standards

While performing spray painting operations the Permittee shall comply with the following requirements:

- i. The Permittee shall not conduct any spray painting operation without minimizing organic solvent emissions. Such operations other than architectural coating and spot painting, shall be conducted in an enclosed area equipped with controls containing no less than 96 percent of the overspray.

[A.A.C.R18-2-727.A]

- ii. The Permittee shall not either:
- (a) Employ, apply, evaporate or dry any architectural coating containing photochemically reactive solvents for industrial or commercial purposes; or
 - (b) Thin or dilute any architectural coating with a photochemically reactive solvent. [A.A.C.R18-2-727.B]
- iii. For the purposes of parts (ii) and (v) of this condition, a photochemically reactive solvent shall be any solvent with an aggregate of more than 20 percent of its total volume composed of the chemical compounds classified in paragraphs (a) through (c) of this subsection, or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:
- (a) A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation - hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones : five percent
 - (b) A combination of aromatic compounds with eight or more carbon atoms to the molecule except ethylbenzene: eight percent
 - (c) A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20 percent [A.A.C.R18-2-727.C]
- iv. Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the groups or organic compounds described in subsection iii(a) through iii(c) of this condition, it shall be considered to be a member of the group having the least allowable percent of the total volume of solvents. [A.A.C.R18-2-727.D]
- v. The Permittee shall not dispose by evaporation more than 1.5 gallons of photochemically reactive solvent in any one day. [SIP Provision R9-3-527.C]

b. Monitoring, Recordkeeping, and Reporting Requirements

i. Each time a spray painting project is conducted, the Permittee shall log in ink or in an unchangeable electronic format, a record of the following:

- (a) The date the project was conducted;
- (b) The duration of the project;
- (c) Type of control measures employed; and
- (d) Material Safety Data Sheets for all paints and solvents used in the project.

[A.A.C.R18-2-306.A.3.b]

ii. Architectural coating and spot painting projects shall be exempt from the recordkeeping requirements of part (i) above.

c. Permit Shield

Compliance with the conditions of this part shall be deemed compliance with A.A.C.R18-2-727 and SIP Provision R9-3-527.C.

[A.A.C. R18-2-325]

B. Demolition/Renovation

1. Emission Limitations/Standards

The Permittee shall comply with the applicable requirements of 40 CFR 61, Subpart M (National Emissions Standards for Hazardous Air Pollutants - Asbestos).

[A.A.C.R18-2-1101.A.8]

2. Monitoring, Recordkeeping, and Reporting Requirements

Permittee shall keep all required records in a file. The required records include the “NESHAP Notification for Renovation and Demolition Activities” form and all supporting documents.

3. Permit Shield

Compliance with the conditions of this part shall be deemed compliance with A.A.C.R18-2-1101.A.8.

[A.A.C. R18-2-325]

C. Nonvehicle Air Conditioner Maintenance and/or Services

1. Emission Limitations/Standards

The Permittee shall comply with the applicable requirements of 40 CFR 82 - Subpart F (Protection of Stratospheric Ozone - Recycling and Emissions Reduction). [40 CFR 82, Subpart F]

2. Monitoring, Recordkeeping, and Reporting Requirements

Permittee shall keep all records required by the applicable requirements of 40 CFR 82 - Subpart F in a file.

3. Permit Shield

Compliance with the conditions of this part shall be deemed compliance with 40 CFR 82- Subpart F. [A.A.C. R18-2-325]

ATTACHMENT "C": EQUIPMENT LIST

**Air Quality Control Permit No. 1000443
for
Georgia-Pacific Tissue, LLC**

Unit	Make/Model	Date of manufacture	Size/ Production Capacity	Unit ID
Fiber Preparation Operations				
No 1 Pulper	Voith/HD18	1986	120 tons/day	5863612
No 2 Pulper	Voith/HD18	1999	120 ton/day	
No 3 Pulper	Black Clawson	1970	58 ton/day	
No 1 Pulper Dump Chest	Custom			
No 2 Pulper Dump Chest	Custom	1999		
No 3 Pulper Dump Chest	Custom	1970		
#1 Rotating Screen	Voith	1986	200 ton/day	
System chest	Custom	1990	200 ton/day	
Primary Cleaner Feed Tank	Custom			
Primary forward cleaners	Beloit	1990	200 ton/day	
Secondary cleaners	Beloit	1990	60 ton/day	
Tertiary cleaners	Beloit	1990	30 ton/day	
Reverse Cleaner Feed tank	Custom			
Third Stage Cleaners	Beloit	1999	10 ton/day	
Primary fine screen (1.5 mm holes)	Voith	1999	200 ton/day	
Secondary Feed Tank	Custom			
Secondary Fine Screen	Voith	1999	60 ton/day	
No 1 flotation cell	Voith	1970	200 ton/day	
Krofta feed chest	Custom			
Tertiary Feed Tank	Custom	1970		
Tertiary Fine Screen	Voith	1999	20 ton/day	

Unit	Make/Model	Date of manufacture	Size/ Production Capacity	Unit ID
No 2 flotation cell	Esherwize	1970	200 ton/day	
Washers	Rama	1970	200 ton/day	
Washers (2)	Custom	1970		
Paper Mill				
Mill Transfer Tank	Custom			
Wash Stock Tank	Custom			
Blend Chest #5	Custom			
Machine chest #5	Custom			
Blend chest #6	Custom			
Machine chest #6	Custom			
Refiner #6	Beloit	1990	120 tons/day	
Wire and felt section #5	Osborne	1963		
After Dryer #5	Custom	1998		
Yankee dryer #5	Beloit	1951		
Reel #5	Osborne	1963		
Head Box Pressure screen #6	Julavara	1970		
Head Box #6	Comer	1996		
Wire and felt section #6	Custom	1996		
Yankee dryer #6	Beloit	1996		
Reel #6	Beloit	1963		
Winders	Beloit	1963		
Combustion Units				
Paper Machine #5- Air Cap Burner	Maxon	1995	16.5 MMBtu/hr	
Paper Machine #6- Air Cap Burner 1	Maxon	1997	16.5 MMBtu/hr	
Paper Machine #6- Air Cap Burner 2	Maxon	1997	16.5 MMBtu/hr	
Cleaver Brooks Boiler	Cleaver Brooks	1998	60.7 MMBtu/hr	

Unit	Make/Model	Date of manufacture	Size/ Production Capacity	Unit ID
Wastewater Treatment Plant				
Aeration Basin	Aqua Aerobics	1990		
Settling Clarifier	Custom			
DAF Unit- Deink	Krofta	1986		
Sludge Press- 1 meter	Belmar	1970	50 tons/day	
DAF Unit- Paper Mill	FRC	1996		
Sludge Press- 2 meter	Andritz	1997		
Poly Press	Meri	1997		
Black Water Tank	Custom	1990		
ClO ₂ generator (biocide)		2000	85 lbs/day	
Solvent storage tank	Custom			
Ammonia tank	Custom			